

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla,
El Cachu, El Viejo, El Fortachon, Clavito
(counts 1-23)

[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao,
El heladero
(counts 1, 2, 3, 14, 19-21)

[3] JAIR EUDORO RAMIREZ-DIAZ
aka El Gordo, Compadre
(counts 1, 2, 3)

[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco
(counts 1, 2, 3, 23)

[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla
(counts 1, 2, 3, 23)

[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero
(counts 1, 2, 3, 5, 6, 10, 13)

[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso
(counts 1, 2, 3, 11, 12)

[8] GAMALIER
GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco,
La Manito Manca, (counts 1-9, 14-16, 18, 20)

[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio
(counts 1-10, 15-18, 20)

CRIMINAL NO. 14-726 (A)

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VIOLATIONS:

Title 21, United States Code, Sections 963, 952 and 960(a)(1) (b)(1)(B), (b)(1)(A), b)(2)(G);

Title 21, United States Code, Section 846, 841(a)(1) and 841(b)(1)(A)(ii), (b)(1)(A)(i), (b)(1)(B)(vii);

Title 18, United States Code, Section 1956 (h) and 1956 (a)(1)(B)(i) and 1956 (a)(2)(A)

Title 18, United States Code, Section 1956 (a)(1)(B)(i) and §2

Title 18, United States Code, Section 1956 (a)(2)(A) and §2

**TWENTY-THREE COUNTS &
FORFEITURE ALLEGATIONS**

[10] EDUARDO ESTERAS-ROSADO
aka El Loco, Ricky, Juni, Juni Difunto, Jun,
El Cuñao
(counts 1-3)

[11] JOSE O. MEDINA-NERY
aka Jose Vivas
(counts 2-4)

[12] HUGO ENRIQUE ROMERO-VARGAS
aka El Mocho, El Mochito, Kike
(counts 2-3, 7)

[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera
(counts 2-3, 9)

[14] NOE CARBAJAL
(counts 2-3, 9)

[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo
(counts 2-3, 19-21)

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu
(counts 1-3, 13)

[17] MIGUEL VARGAS-ROA
aka El Flaco, Gelo, Miguel Vargas-Rua,
Bejuco
(counts 1-2)

[18] RICARDO RODRIGUEZ-RODRIGUEZ
aka John, Gordo
(counts 1-2)

[19] JORGE VILLARRAN-ROMERO
aka El Calvo, El Calvito
(counts 2-3)

[20] FRANCISCO OTERO-RETAMAR
aka Frank, Franki
(counts 1-2)

[21] MIGUEL A. LEBRON-HERNANDEZ
aka Tito
(counts 1-2)

[22] ELDIN MELENDEZ-SANTIAGO
aka El Vampiro
(counts 1-2)

[23] ANGEL M. SIERRA-RIVERA
aka Pancho
(counts 1-2)

[24] BERGMAN SANTIAGO-CONTES
(counts 1-2)

[25] JOSE MARTINEZ-MELENDEZ
aka Joito
(counts 1-2)

[26] FLOR MARINA GONZALEZ-ROJAS
(counts 1-3, 19-20, 23)

[27] GEOFANNY MOSQUERA-VANEGAS
(counts 2-3)

[28] YURGEN GABRIEL ALVAREZ
GUTIERREZ
(counts 2-3)

[29] BRIAN MONTALVO-TOLENTINO
(counts 1-2, 12)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Import a Controlled Substance
(Title 21, United States Code, Sections 963 & 952 & 960(a)(1) (b)(1)(B), (b)(1)(A), (b)(2)(G))

From in or about November 2010, and continuing until in or about September 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court:

[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito

[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero

[3] JAIR EUDORO RAMIREZ-DIAZ
aka El Gordo, Compadre

[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco

[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla

[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero

[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso

[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca

[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio

[10] EDUARDO ESTERAS-ROSADO
aka El Loco, Ricky, Juni, Juni Difunto, Jun, El Cuñao

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu

[17] MIGUEL VARGAS-ROA
aka El Flaco, Gelo, Miguel Vargas-Rua, Bejuco

[18] RICARDO RODRIGUEZ-RODRIGUEZ
aka John, Gordo

[20] FRANCISCO OTERO-RETAMAR
aka Frank, Franki

[21] MIGUEL A. LEBRON-HERNANDEZ
aka Tito

[22] ELDIN MELENDEZ-SANTIAGO
aka El Vampiro

[23] ANGEL M. SIERRA-RIVERA
aka Pancho

[24] BERGMAN SANTIAGO-CONTES

[25] JOSE MARTINEZ-MELENDEZ
aka Joito

[26] FLOR MARINA GONZALEZ-ROJAS

[29] BRIAN MONTALVO-TOLENTINO

the defendants herein did knowingly and intentionally combine, conspire, confederate and agree with each other and with diverse other persons to commit an offense against the United States, to wit: to import into the customs territory of the United States from places outside thereof, to include Colombia, Venezuela, Saint Croix, Saint Thomas, Dominican Republic and Mexico, five **(5) kilograms** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II Narcotic Drug Controlled Substance; one **(1) kilogram** or more of a mixture or substance containing a detectable amount of **heroin**, a Schedule I Narcotic Drug Controlled Substance; one hundred **(100) kilograms** a mixture or substance containing a detectable amount of

marihuana, a Schedule I, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Section 963, 952 and 960(a)(1) (b)(1)(B), (b)(1)(A), (b)(2)(G).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to import controlled substances, to include cocaine, heroin and marijuana into Puerto Rico from places outside of the United States, such as Colombia, Venezuela, Saint Croix, Saint Thomas, Dominican Republic and Mexico and others, all for significant financial gain and profit.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

- a. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would coordinate the importation of multi-kilogram quantities of controlled substances, to include cocaine, heroin, and marijuana into Puerto Rico from places outside thereof, to include Colombia, Venezuela, Saint Croix, Saint Thomas, Dominican Republic and Mexico among others;
- b. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would coordinate the maritime and in-land transportation of the controlled substances into Puerto Rico, which included the use of different type of vessels and vehicles;
- c. It was part of the manner and means of the conspiracy that once the controlled substances were smuggled into Puerto Rico, some of the controlled substances would be resold in Puerto Rico for profit and some would be further transported to the continental United States for eventual resale;

d. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would reap profits from the sale of these controlled substances;

e. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would travel, and use facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on and further the conspiracy;

f. It was part of the manner and means of the conspiracy that one or more of the defendants would require that other defendants and / or their associates travel to Venezuela and other places and remain there during the drug smuggling ventures to act as a guarantee for the payment of the controlled substances smuggled into Puerto Rico. These individuals are known in the drug trafficking business as "Fiscales."

g. It was part of the manner and means of the conspiracy that one or more of the defendants would use threats, intimidation, and acts of violence to include kidnappings, to collect debts for the controlled substances smuggled into Puerto Rico.

COUNT TWO

Conspiracy to Possess With Intent to Distribute Controlled Substances
(Title 21, United States Code, Sections 846, 841(a)(1) (b)(1)(A)(ii), (b)(1)(A)(i), (b)(1)(B)(vii))

From in or about November 2010, and continuing until in or about September 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito

[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero

[3] JAIR EUDORO RAMIREZ-DIAZ
aka El Gordo, Compadre

[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco

[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla

[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero

[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso

[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Mance, La Manito Manca

[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio

[10] EDUARDO ESTERAS-ROSADO
aka El Loco, Ricky, Juni, Juni Difunto, Jun, El Cuñao

[11] JOSE O. MEDINA-NERY
aka Jose Vivas

[12] HUGO ENRIQUE ROMERO-VARGAS
aka El Mocho, El Mochito, Kike

[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera

[14] NOE CARBAJAL

[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu

[17] MIGUEL VARGAS-ROA
aka El Flaco, Gelo, Miguel Vargas-Rua, Bejuco

[18] RICARDO RODRIGUEZ-RODRIGUEZ
aka John, Gordo

[19] JORGE VILLARRAN-ROMERO
aka El Calvo, El Calvito

[20] FRANCISCO OTERO-RETAMAR
aka Frank, Franki

[21] MIGUEL A. LEBRON-HERNANDEZ
aka Tito

[22] ELDIN MELENDEZ-SANTIAGO
aka El Vampiro

[23] ANGEL M. SIERRA-RIVERA
aka Pancho

[24] BERGMAN SANTIAGO-CONTES

[25] JOSE MARTINEZ-MELENDEZ
aka Joito

[26] FLOR MARINA GONZALEZ-ROJAS

[27] GEOVANNY MOSQUERA-VANEGAS

[28] YURGEN GABRIEL ALVAREZ GUTIERREZ

[29] BRIAN MONTALVO-TOLENTINO

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with diverse other persons, known and unknown to the Grand Jury to commit an offense against the United States, that is: a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii), (b)(1)(A)(i), (b)(1)(B)(vii), namely, possession with intent to distribute five **(5) kilograms** or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance; one **(1) kilogram** or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance; one hundred **(100) kilograms** or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Sections 846, 841(a)(1) (b)(1)(A)(ii), (b)(1)(A)(i), (b)(1)(B)(vii).

COUNT THREE

Conspiracy to Launder Monetary Instruments Title 18, United States Code, Section 1956 (h) and 1956 (a)(1)(B)(i) and 1956 (a)(2)(A)

From in or about November 2010, and continuing until in or about September 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court:

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito**

**[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero**

**[3] JAIR EUDORO RAMIREZ-DIAZ
aka El Gordo, Compadre**

**[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco**

**[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla**

[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero

[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso

[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca

[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio

[10] EDUARDO ESTERAS-ROSADO
aka El Loco, Ricky, Juni, Juni Difunto, Jun, El Cuñao

[11] JOSE O. MEDINA-NERY
aka Jose Vivas

[12] HUGO ENRIQUE ROMERO-VARGAS
aka El Mocho, El Mochito, Kike

[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera

[14] NOE CARBAJAL

[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu

[19] JORGE VILLARRAN-ROMERO
aka El Calvo, El Calvito

[26] FLOR MARINA GONZALEZ-ROJAS

[27] GEOVANNY MOSQUERA-VANEGAS

[28] YURGEN GABRIEL ALVAREZ GUTIERREZ

[29] BRIAN MONTALVO-TOLENTINO

did knowingly combine, conspire, and agree with each other and with diverse other persons to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 to wit: (a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A)(ii), (b)(1)(A)(i), (b)(1)(B)(vii) and Title 21, United States Code, Sections 963, 952, 960(a)(1) (b)(1)(B), (b)(1)(A), (b)(2)(G) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity; and (b) to knowingly transmit or transfer and attempt to transmit or transfer a monetary instruments or funds from a place inside the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1); and/or Title 21, United States Code, Section 963, 952 and 960 (a)(1). All in violation of Title 18, United States Code, Sections 1956 (h) and 1956 (a)(1)(B)(i) and 1956 (a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and his associates would accomplish and further the objects of the conspiracy to launder money, among others, included the following:

- a. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates operating in Puerto Rico, would reap profits from the sale of controlled substances smuggled into Puerto Rico;
- b. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates operating in Colombia and other places outside the United States would instruct individuals to receive US currency in Puerto Rico that represented payment and/or profits from the sale of controlled substances smuggled into Puerto Rico;
- c. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would travel, and use facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on and further the conspiracy;
- d. It was part of the manner and means of the conspiracy that the US currency representing payment and/or proceeds from the sale of controlled substances smuggled into Puerto Rico would be sent to individuals or financial institutions in Colombia, Peru, Panama, China, and other places through human couriers or wire transfers;
- e. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would invest part of the proceeds from the sale of the controlled substances sent from Puerto Rico in additional drug trafficking activities;
- f. It was part of the manner and means of the conspiracy that one or more of the defendants and their associates would conceal and disguise the nature, location, source, ownership and control of the illegal proceeds obtained from drug trafficking;

COUNT FOUR

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

From on or about January 20, 2011 to on or about January 24, 2011 in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,
[11] JOSE O. MEDINA-NERY
aka Jose Vivas**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered THIRTY THOUSAND DOLLARS in U.S. Currency (\$30,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT FIVE

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about January 24, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Mance, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered FOUR HUNDRED AND NINETY NINE THOUSAND TWO HUNDRED SEVENTY DOLLARS in U.S. Currency (\$499,270.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT SIX

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about January 25, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] **CARLOS A. SEGURA-GALVIS**
aka **Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito**
[6] **MIREYA CABRA-TRASLAVIÑA**
aka **Angela, Lucero**
[8] **GAMALIER GONZALEZ-MALDONADO**
aka **Gama, El Negro, La Manito, El Manco, La Manito Manca**
[9] **GIOVANNI COSME-FERNANDEZ**
aka **Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered FOUR HUNDRED AND NINETY NINE THOUSAND AND FIFTEEN DOLLARS in U.S. Currency (**\$499,015.00**) which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT SEVEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about February 1, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,
[12] HUGO ENRIQUE ROMERO-VARGAS
Aka El Mochito, El Mochito, Kike,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered FIVE HUNDRED AND THIRTY FOUR THOUSAND THREE HUNDRED TEN DOLLARS in U.S. Currency (**\$534,310.00**), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT EIGHT

Laundering of Monetary Instruments (International Money Laundering) Title 18, United States Code, Section 1956 (a)(2)(A)

From on or about February 2, 2011 to on or about February 10, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly transmit or transfer and attempt to transmit or transfer a monetary instruments or funds, that is Western Union money transfers for the total amount of THIRTY SIX THOUSAND DOLLARS in U.S. CURRENCY (\$36,000.00), from a place inside the United States, that is Puerto Rico, to a place outside the United States, that is Colombia and Peru, with the intent to promote the carrying on of specified unlawful activity, that is the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections Section 846, 841(a)(1); and/or Title 21, United States Code, Section 963, 952 and 960 (a)(1). All in violation of Title 18, United States Code, § 1956 (a)(2)(A) and §2

COUNT NINE

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

From on or about February 14, 2011 to on or about February 17, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,
[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera,
[14] NOE CARBAJAL**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered FIVE HUNDRED EIGHTY TWO THOUSAND FIVE HUNDRED ONE DOLLARS in U.S. Currency (**\$582,501.00**), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

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COUNT TEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about March 1, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered TWO HUNDRED NINETY NINE THOUSAND FIVE HUNDRED SIXTY DOLLARS in U.S. Currency (**\$299,560.00**), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT ELEVEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about March 3, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered TWO HUNDRED THOUSAND ONE HUNDRED AND THIRTY DOLLARS in U.S. Currency (\$200,130.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT TWELVE

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

From in or about March 14, 2011 to in or about March 16, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso
[29] BRIAN MONTALVO-TOLENTINO**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered TWO HUNDRED NINETY NINE THOUSAND NINE HUNDRED SEVENTY DOLLARS in U.S. Currency (**\$299,970.00**), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT THIRTEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about March 23, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero
[16] EDWIN LOZADA-FLORES
Aka El Vecino, Edu**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered THREE HUNDRED THIRTY TWO THOUSAND EIGHT HUNDRED AND SIXTY DOLLARS in U.S. Currency (\$332,860.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT FOURTEEN

Laundering of Monetary Instruments (International Money Laundering) Title 18, United States Code, Section 1956 (a)(2)(A)

From on or about May 6, 2011 to on or about May 12, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly transmit or transfer and attempt to transmit or transfer a monetary instruments or funds, that is Western Union money transfers for the total amount of FORTY SEVEN THOUSAND NINE HUNDRED DOLLARS in U.S. CURRENCY (\$47,900.00), from a place inside the United States, that is Puerto Rico, to a place outside the United States, that is Colombia, with the intent to promote the carrying on of specified unlawful activity, that is the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections Section 846, 841(a)(1); and/or Title 21, United States Code, Section 963, 952 and 960 (a)(1). All in violation of Title 18, United States Code, § 1956 (a)(2)(A) and §2.

COUNT FIFTEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about January 26, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered EIGHTEEN THOUSAND DOLLARS in U.S. Currency (\$18,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT SIXTEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

In or about March, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered TEN THOUSAND DOLLARS in U.S. Currency (\$10,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT SEVENTEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about March 27, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered SEVENTY THOUSAND DOLLARS in U.S. Currency (\$70,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT EIGHTEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

In or about April, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca
[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio,**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered EIGHTY THOUSAND DOLLARS in U.S. Currency (\$80,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT NINETEEN

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about April 15, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero
[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo
[26] FLOR MARINA GONZALEZ-ROJAS**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered FIFTY THOUSAND DOLLARS in U.S. Currency (**\$50,000.00**), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT TWENTY

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about April 17, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] **CARLOS A. SEGURA-GALVIS**
aka **Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito**
[2] **ADOLFO LEON GARCIA-SIERRA**
aka **Fito, Maporu, Mamporu, Cuñao, El heladero**
[8] **GAMALIER GONZALEZ-MALDONADO**
aka **Gama, El Negro, La Manito, El Manco, La Manito Manca**
[9] **GIOVANNI COSME-FERNANDEZ**
aka **Yoa, El Rubio,**
[15] **FELIPE FRANCISCO DE LA PLAZA**
aka **Don Antonio, Gringo, El Gringo**
[26] **FLOR MARINA GONZALEZ-ROJAS**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered TWENTY THOUSAND DOLLARS in U.S. Currency (\$20,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the

proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT TWENTY-ONE

Laundering of Monetary Instruments (Title 18, United States Code, Section 1956 (a)(1)(B)(i))

On or about April 19, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero
[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered SIXTY THOUSAND DOLLARS in U.S. Currency (\$60,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956

(a)(1)(B)(i) and §2.

COUNT TWENTY-TWO

**Laundering of Monetary Instruments
(Title 18, United States Code, Section 1956 (a)(1)(B)(i))**

On or about April 19, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, transported and delivered SEVENTEEN THOUSAND DOLLARS in U.S. Currency (\$17,000.00), which involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 846, 841(a)(1) and Title 21, United States Code, Sections 963, 952, 960(a)(1) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, the source, the ownership, and the control of the proceeds of such specified unlawful activity, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, § 1956 (a)(1)(B)(i) and §2.

COUNT TWENTY-THREE

Laundering of Monetary Instruments (International Money Laundering) Title 18, United States Code, Section 1956 (a)(2)(A)

From on or about April 19, 2012 to on or about April 20, 2012, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito
[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco
[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla
[26] FLOR MARINA GONZALEZ-ROJAS**

the defendants herein, aiding and abetting each other and other diverse persons, did knowingly transmit or transfer and attempt to transmit or transfer a monetary instruments or funds, that is Western Union money transfers for the total amount of SIXTEEN THOUSAND DOLLARS in U.S. CURRENCY (\$16,000.00), from a place inside the United States, that is Puerto Rico, to a place outside the United States, that is Colombia, with the intent to promote the carrying on of specified unlawful activity, that is the felonious manufacture, importation, receiving, concealment, buying, selling or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections Section 846, 841(a)(1); and/or Title 21, United States Code, Section 963, 952 and 960 (a)(1). All in violation of Title 18, United States Code, § 1956 (a)(2)(A) and §2.

NARCOTICS FORFEITURE ALLEGATION
(Title 21, United States Code, Sections 853, 881 & 970)

1. The allegations contained in Count **ONE** and **TWO** of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853 and 970, upon conviction of any of the offenses alleged in counts **ONE** and **TWO** of this Indictment, the defendants:

[1] CARLOS A. SEGURA-GALVIS
aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito

[2] ADOLFO LEON GARCIA-SIERRA
aka Fito, Maporu, Mamporu, Cuñao, El heladero

[3] JAIR EUDORO RAMIREZ-DIAZ
aka El Gordo, Compadre

[4] ROQUE CABALLERO-CABALLERO
aka Roque, Roco

[5] HUGO OCAMPO-GUTIERREZ
aka Luis Bonilla, Luis Alfonso Bonilla

[6] MIREYA CABRA-TRASLAVIÑA
aka Angela, Lucero

[7] ELKIN MELENDEZ-SANTIAGO
aka El Gordo, El Canoso

[8] GAMALIER GONZALEZ-MALDONADO
aka Gama, El Negro, La Manito, El Manco, La Manito Manca

[9] GIOVANNI COSME-FERNANDEZ
aka Yoa, El Rubio

[10] EDUARDO ESTERAS-ROSADO
aka El Loco, Ricky, Juni, Juni Difunto, Jun, El Cuñao

[11] JOSE O. MEDINA-NERY
aka Jose Vivas

[12] HUGO ENRIQUE ROMERO-VARGAS
aka El Mocho, El Mochito, Kike

[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera

[14] NOE CARBAJAL

[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu

[17] MIGUEL VARGAS-ROA
aka El Flaco, Gelo, Miguel Vargas-Rua, Bejuco

[18] RICARDO RODRIGUEZ-RODRIGUEZ
aka John, Gordo

[19] JORGE VILLARRAN-ROMERO
aka El Calvo, El Calvito

[20] FRANCISCO OTERO-RETAMAR
aka Frank, Franki

[21] MIGUEL A. LEBRON-HERNANDEZ
aka Tito

[22] ELDIN MELENDEZ-SANTIAGO
aka El Vampiro

[23] ANGEL M. SIERRA-RIVERA
aka Pancho

[24] BERGMAN SANTIAGO-CONTES

[25] JOSE MARTINEZ-MELENDEZ
aka Joito

[26] FLOR MARINA GONZALEZ-ROJAS

[27] GEOVANNY MOSQUERA-VANEGAS

[28] YURGEN GABRIEL ALVAREZ GUTIERREZ

[29] BRIAN MONTALVO-TOLENTINO

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

3. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

MONEY LAUNDERING FORFEITURE ALLEGATION

(Title 18, United States Code, Section 982)

1. The allegations contained in Counts **THREE** through **TWENTY-THREE** of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of any of the offenses alleged in counts **THREE** through **TWENTY-THREE**, the defendants:

[1] CARLOS A. SEGURA-GALVIS

aka Torero, El Toro, Amigazo, Puntilla, El Cachu, El Viejo, El Fortachon, Clavito

[2] ADOLFO LEON GARCIA-SIERRA

aka Fito, Maporu, Mamporu, Cuñao, El heladero

[3] JAIR EUDORO RAMIREZ-DIAZ

aka El Gordo, Compadre

[4] ROQUE CABALLERO-CABALLERO

aka Roque, Roco

[5] HUGO OCAMPO-GUTIERREZ

aka Luis Bonilla, Luis Alfonso Bonilla

[6] MIREYA CABRA-TRASLAVIÑA

aka Angela, Lucero

[7] ELKIN MELENDEZ-SANTIAGO

aka El Gordo, El Canoso

[8] GAMALIER GONZALEZ-MALDONADO

aka Gama, El Negro, La Manito, El Manco, La Manito Manca

[9] GIOVANNI COSME-FERNANDEZ

aka Yoa, El Rubio

[10] EDUARDO ESTERAS-ROSADO

aka El Loco, Ricky, Juni, Juni Difunto, Jun, El Cuñao

[11] JOSE O. MEDINA-NERY

aka Jose Vivas

[12] HUGO ENRIQUE ROMERO-VARGAS
aka El Mocho, El Mochito, Kike

[13] EDISON MIRANDA-ANGULO
aka El Niche, El Boxeador, Pantera

[14] NOE CARBAJAL

[15] FELIPE FRANCISCO DE LA PLAZA
aka Don Antonio, Gringo, El Gringo

[16] EDWIN LOZADA-FLORES
aka El Vecino, Edu

[19] JORGE VILLARRAN-ROMERO
aka El Calvo, El Calvito

[26] FLOR MARINA GONZALEZ-ROJAS

[27] GEOVANNY MOSQUERA-VANEGAS

[28] YURGEN GABRIEL ALVAREZ GUTIERREZ

shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

3. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney


JOSE A. RUIZ-SANTIAGO

Assistant United States Attorney
Chief Criminal Division

FOREPERSON

Date: 12/04/2014


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